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8 Attorney for FRANCISCO JAVIER MARES

9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 FRANCISCO JAVIER MARES,

15 Defendant.

Case No. 2:20-CR-00018-JCM-EJY-2

**SUPPLEMENT TO MOTION TO  
EXTEND SELF-SURRENDER DATE  
AND/OR FOR BAIL PENDING  
APPEAL AND/OR STAY  
EXECUTION OF THE SENTENCE  
PENDING APPEAL**

16 Defendant Francisco Mares requested this Court order extend his self-surrender date  
17 currently set for June 24, 2022 and/or grant bail pending appeal as to the incarceration portion  
18 of his sentence. Due to impending self-surrender date was, undersigned counsel submitted the  
19 motion prior to receiving transcripts. After reviewing transcripts, Mr. Mares would like to  
20 clarify that the main issue on direct appeal in this case will be ineffective assistance of  
21 counsel in trial counsel not objecting to the prosecutor's breach of the plea agreement in  
22 submitting a motion for Mr. Mares's plea to be withdrawn and for withdrawing the  
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1 recommendation for minus three points for acceptance of responsibility in its motion for  
2 status conference, denying Mr. Mares of a unified front at sentencing. *See* Dckt 70.  
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5 DATED this 9th day of June, 2022.

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7 */s/ Nicole G. Saperstein*  
By: \_\_\_\_\_  
8 NICOLE G. SAPERSTEIN  
9 CJA Counsel for Francisco Javier Mares  
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# CERTIFICATE OF ELECTRONIC SERVICE

The undersigned hereby certifies that she is CJA counsel for the District of Nevada and is a person of such age and discretion as to be competent to serve papers. That on June 9, 2022, she served an electronic copy of the above and foregoing SUPPLEMENT TO MOTION TO EXTEND SELF-SURRENDER DATE AND/OR FOR BAIL PENDING APPEAL OR IN THE ALTERNATIVE TO STAY EXECUTION OF THE SENTENCE PENDING APPEAL by electronic service (ECF) to the person named below:

**ALLISON REECE**  
**Assistant United States Attorney**  
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